

HONORABLE MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

NORTHSHORE SHEET METAL, INC.,

Plaintiff,

v.

SHEET METAL WORKERS  
INTERNATIONAL ASSOCIATION, LOCAL  
66,

Defendant.

No. 2:15-CV-01349 MJP

**STIPULATED MOTION TO AMEND  
CASE SCHEDULE**

NOTED ON MOTION CALENDAR:

**April 12, 2016**

**STIPULATED MOTION**

1. Sheet Metal Workers International Association, Local 66 (“Union”) and Northshore Sheet Metal, Inc. (“Northshore”) mutually request an extension of the case schedule.

2. The parties are in the midst of discovery and have yet to exchange all relevant information. This has impacted both the Union and Northshore’s ability to complete their

1 expert witness disclosure. Both parties are still awaiting additional interrogatory responses and  
2 document disclosures.

3 3. The parties are awaiting the Court's ruling on the Motion to Stay (Dkt. # 51) to  
4 determine which portion of the case will proceed to trial.

5 4. Northshore is awaiting the Court's ruling on its Motion to Compel (Dkt. # 52).

6 5. The Union has outstanding interrogatory and document requests to Northshore.  
7 The Union and Northshore have been unable to reach an agreement on a response. Northshore  
8 has yet to disclose all information it possesses in response to the discovery.  
9

10 6. The Union requires the additional information and documents from Northshore in  
11 order to secure an expert opinion and report.

12 7. The parties would request additional time to gather the necessary information.  
13 Both parties have an interest in having a complete expert opinion. Lacking all the information,  
14 both parties are unable to meet the current deadline.

15 8. Separately, the parties have tentatively agreed to mediation on May 9, 2016 with  
16 Richard Omata.

17 9. Counsel for Northshore will also be out of the country for a portion of this case.  
18 He has filed a Notice of Unavailability (Dkt. # 64). He will be unavailable from June 8 to June  
19 24, 2016 while outside the U.S.

20 10. Given these facts, the Union and Northshore mutually request the Court extend  
21 the expert witness disclosure, discovery cutoff dates, and motion filing deadlines.

22 11. The parties propose the following revised case schedule:  
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24 //

25 //

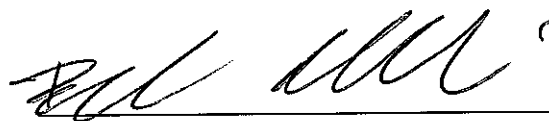
1	Reports from expert witness under FRCP 26(a)(2) due	May 30, 2016
2		
3	All motions related to discovery must be filed by and noted on the motion calendar on third Friday thereafter (see CR7(d))	May 27, 2016
4		
5	Discovery completed by	July 22, 2016
6		
7	All dispositive motions must be filed by and noted on the motion calendar on the fourth Friday thereafter (see CR7(d))	August 5, 2016
8		

9 12. All other case deadlines will remain unchanged.

10 DATED this 12th day of April, 2016.

11 BY: Signed authorization via email on April 11, 2016  
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STIPULATED MOTION TO CONTINUE  
 DISCOVERY AND EXPERT DISCLOSURE  
 DEADLINES  
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